

**INTEROFFICE CORRESPONDENCE**

**DATE:** October 26, 1994

**TO:** P. J. Martin, OU-5, 6, 7 Closures, Bldg 080, X8695

**FROM:** <sup>yes</sup> L. A. Gregory-Frost, Field Operations, Bldg. 080, X8750

**SUBJECT:** HAZARDOUS WASTE DETERMINATION AND TREATMENT OPTIONS RATIONALE - LAG-059-94

**DOE Order:** 5480.4

**Action:** None required.

**BACKGROUND**

The following rationale is provided in response to your request for information regarding the potential treatment and hazardous waste determination for surface water associated with the seep which drains from the Present Sanitary Landfill into the eastern landfill pond.

The information on which this determination is based includes the following information.

- Multiple waste streams believed to have contained Resource Conservation and Recovery Act (RCRA) listed hazardous wastes were disposed in the landfill prior to 1986 (e.g. rags with freon and trichloroethylene, paper towels with oil and freon).
- Surface water and groundwater infiltrate the landfill and are mixed with listed hazardous waste constituents, including leachate from the wastes.
- Groundwater containing listed hazardous waste constituents "daylights" at the seep, becomes surface water and flows into the pond.

**HAZARDOUS WASTE DETERMINATION**

When actively managed (e.g. in piping, a tank, or a container), the surface water must be handled as a RCRA-regulated hazardous waste with the Environmental Protection Agency (EPA) hazardous waste code, F039.

The interpretation of the applicability of the F039 hazardous waste code to this surface water is based on the description of the F039 listing found in the Colorado Hazardous Waste Regulations (6 CCR 1007-3 Section 261.31(a)), the definition of "leachate" and "disposal" found in 6 CCR 1007-3 Section 260.10, and the knowledge documented within the Environmental Restoration Program Division regarding the multiple sources of RCRA-regulated listed wastes which were disposed within the landfill.

- Regulatory description of F039 listing: Leachate (liquids that have percolated through land disposed wastes) resulting from the disposal of more than one restricted waste classified as hazardous in Subpart D of this part. (Leachate resulting from the disposal of one or more of the following Hazardous Wastes and no other Hazardous Wastes retains its EPA Hazardous Waste Number(s) F020, F021, F022, F026, F027, and/or F028).
- "Leachate" means any liquid, including any suspended components in the liquid, that has percolated through or drained from hazardous waste.
- "Disposal" means the discharge, deposit, injection, dumping, spilling, leaking or placing of any solid waste or hazardous waste into or on any land or water so that such solid waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any water, including groundwaters.

#### POTENTIAL TREATMENT OPTIONS

Groundwater and surface water containing RCRA-regulated hazardous wastes are currently treated in the Operable Unit 1 (OU-1) treatment facility. The treated groundwater and surface water are discharged in accordance with the Interim Measures/Interim Remedial Action (IM/IRA) approved Applicable Relevant and Appropriate Requirements (ARARs). From a RCRA perspective, the surface water containing F039 hazardous waste constituents is a "contained-in" waste, and can be treated at the OU-1 treatment facility, if the approved IM/IRA work plans for OU-1 and/or OU-7 includes this source of water for treatment.

Please contact M. Burmeister at extension 5891 to determine if the IM/IRA approved documentation for OU-1 treatment facility allows treatment of this surface water, or what actions must be taken in order to receive approval for treatment of these surface waters at the OU-1 treatment facility. Previous discussions with M. Burmeister have indicated his willingness to consider additional "contained-in" wastes for treatment in the OU-1 treatment facility. If you have any questions or require additional information, please contact me at extension 6971.

bk

cc:

M. G. Broussard  
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ERPD Project File (2)



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